

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

BETH ANNE M. COLLOPY)
Plaintiff,) **Civil Action No. 1:22-CV-00184-SE**
v.)
MARQUIS MANAGEMENT, LLC)
Defendant.)

)

DECLARATION OF OWEN R. GRAHAM

I, Owen R. Graham, having been duly sworn, depose, and state as follows:

1. I am over eighteen years of age and believe in the obligation of an oath.
2. I am an associate with the law firm of Hinckley Allen & Snyder, LLP and am counsel for Defendant Marquis Management, LLC (“Defendant”) in the above-captioned matter.
3. I submit this declaration in support of Defendant’s Motion for Summary Judgment.
4. Attached hereto as Tab A is a true and accurate copy of excerpts from the transcript of Beth Anne Collopy’s deposition, dated January 26, 2023, taken in the matter of *Daniel Lieber v. Marquis Management, LLC, et al*, 1:21-CV-968-JL (the “Lieber Matter”), currently pending before this Court (Laplante, J.).¹
5. Attached hereto as Tab B is a true and accurate copy of excerpts from the transcript of Beth Anne Collopy’s deposition in this matter, dated June 7, 2023.
6. Attached hereto as Tab C is a true and accurate copy of excerpts from the transcript of Christopher Moore’s deposition, dated December 12, 2022, taken in the Lieber Matter.

¹ References to deposition testimony taken in the matter of *Lieber v. Marquis Management, LLC, et al* are denoted in Defendant’s Motion for Summary Judgment as “Day 1,” while testimony taken in the instant action is denoted as “Day 2” for those witnesses who testified in both actions.

7. Attached hereto as Tab D is a true and accurate copy of excerpts from the transcript of Christopher Moore's deposition in this matter, dated June 14, 2023.

8. Attached hereto as Tab E is a true and accurate copy of excerpts from the transcript of Scott Watkins's deposition, dated December 21, 2022, taken in the Lieber Matter.

9. Attached hereto as Tab F is a true and accurate copy of excerpts from the transcript of Scott Watkins's deposition in this matter, dated June 16, 2023.

10. Attached hereto as Tab G is a true and accurate copy of excerpts from the transcript of Michael Fruhbeis's deposition, dated December 1, 2022, taken in the Lieber Matter.

11. Attached hereto as Tab H is a true and accurate copy of excerpts from the transcript of Michael Fruhbeis's deposition in this matter, dated June 20, 2023.

12. Attached hereto as Tab I is a true and accurate copy of excerpts from the transcript of Irving Santos's deposition in this matter, dated June 26, 2023.

13. Attached hereto as Tab J is a true and accurate copy of excerpts from the transcript of Jon Marquis's deposition, dated December 15, 2022, taken in the Lieber Matter.

FURTHER AFFIANT SAYETH NAUGHT.

SIGNATURE PAGE TO FOLLOW

/s/ Owen R. Graham
Owen R. Graham

STATE OF NEW HAMPSHIRE
COUNTY OF HILLSBOROUGH

Then and there personally appeared Owen R. Graham who subscribed the foregoing Affidavit and who swore to the truth of the statements contained therein before me, the undersigned authority on this 18th day of July, 2023.

/s/ Susan M. Comer
Notary Public
My Commission expires: 5/18/2027